

Fill in this information to identify the case:

Debtor 1 Chong Yon Huber aka Sujin Huber aka Sujin Chong Huber

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania
(State)

Case number 5:20-00795-MJC

Form 4100R**Response to Notice of Final Cure Payment****10/15****According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.****Part 1: Mortgage Information**

Name of creditor: TH MSR Holdings, LLC
c/o RoundPoint Mortgage Servicing LLC

Court claim no. (if known): 12

Last 4 digits of any number you use to identify the debtor's account: 7 3 6 2

Property address: 3 Wagon Road
Number Street

Jefferson Township PA 18436
City State ZIP Code

Part 2: Prepetition Default Payments*Check one:*

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment*Check one:*

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: / /
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ 8,702.24

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 0.00

c. **Total.** Add lines a and b. (c) \$ 8,702.24

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: 01 / 01 / 2025
MM / DD / YYYY

Debtor 1 Chong Yon Huber
First Name Middle Name Last Name

Case number (if known) 5:20-00795-MJC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Michael Clark
Signature

Date 04 / 15 / 2025

Print Michael Clark
First Name Middle Name Last Name

Title Attorney

Company Pincus Law Group, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address Five Greentree Centre, 525 Route 73 North, Suite 309
Number Street

Marlton NJ 08053
City State ZIP Code

Contact phone (516) 699 - 8702

Email mclark@pincuslaw.com

4/13/2025
Huber
20-00795
1/1/2025
\$0.00

Pre-Fees Due:	\$0.00
Esc. Deficiency	(\$438.34)
Esc. Shortage	(\$1,199.70)
Less funds on hand	\$0.00
Total Due:	(\$1,638.04)
POC paid in full on 8/24/21	

Total Due	\$0.00

12/1/2021	\$1,906.76
12/1/2022	\$1,844.16
12/1/2023	\$2,058.64
11/1/2024	\$2,175.56
a	

Application of Funds

Corp Advances \$0.00 owed

Date Payment Received	Amount Received	Contractual Due date	Amount Due	Amount Applied to Payment	Amount Applied to Pre-Petition Fees	Amount Applied to Pre-Petition Esrow Shortage & Deficiency	Additional To Principal	Suspense Balance
		4/1/2020			\$0.00	(\$1,638.04)	\$0.00	\$0.00
4/15/2020	\$1,831.19	4/1/2020	\$1,831.19	\$1,831.19				\$0.00
5/8/2020	\$1,831.19	5/1/2020	\$1,831.19	\$1,831.19				\$0.00
6/10/2020	\$1,831.19	6/1/2020	\$1,831.19	\$1,831.19				\$0.00
7/14/2020	\$1,831.19	7/1/2020	\$1,831.19	\$1,831.19				\$0.00
8/10/2020	\$1,831.19	8/1/2020	\$1,831.19	\$1,831.19				\$0.00
9/11/2020	\$1,831.19	9/1/2020	\$1,831.19	\$1,831.19				\$0.00
10/8/2020	\$1,831.19	10/1/2020	\$1,831.19	\$1,831.19				\$0.00
11/12/2020	\$1,831.19	11/1/2020	\$1,831.19	\$1,831.19				\$0.00
12/9/2020	\$1,896.11	12/1/2020	\$1,896.11	\$1,896.11				\$0.00
1/8/2021	\$1,896.11	1/1/2021	\$1,896.11	\$1,896.11				\$0.00
2/4/2021	\$1,896.11	2/1/2021	\$1,896.11	\$1,896.11				\$0.00
3/4/2021	\$1,896.11	3/1/2021	\$1,896.11	\$1,896.11				\$0.00
4/5/2021	\$1,896.11	4/1/2021	\$1,896.11	\$1,896.11				\$0.00
5/4/2021	\$1,896.11	5/1/2021	\$1,896.11	\$1,896.11				\$0.00
6/4/2021	\$1,896.11	6/1/2021	\$1,896.11	\$1,896.11				\$0.00
7/6/2021	\$1,896.11	7/1/2021	\$1,896.11	\$1,896.11				\$0.00
8/3/2021	\$1,896.11	8/1/2021	\$1,896.11	\$1,896.11				\$0.00
8/24/2021	\$1,518.04					\$1,518.04		\$0.00
8/24/2021	\$120.00					\$120.00		\$0.00
9/7/2021	\$1,896.11	9/1/2021	\$1,896.11	\$1,896.11				\$0.00
10/7/2021	\$1,896.11	10/1/2021	\$1,896.11	\$1,896.11				\$0.00
12/9/2021	\$1,896.11	11/1/2021	\$1,896.11	\$1,896.11				\$0.00
12/10/2021	\$1,896.11							\$1,896.11
12/15/2021	\$10.65	12/1/2021	\$1,906.76	\$1,906.76				\$0.00
1/3/2022	\$1,906.76	1/1/2022	\$1,906.76	\$1,906.76				\$0.00
2/10/2022	\$1,906.76	2/1/2022	\$1,906.76	\$1,906.76				\$0.00
3/7/2022	\$1,906.76	3/1/2022	\$1,906.76	\$1,906.76				\$0.00
4/11/2022	\$1,906.76	4/1/2022	\$1,906.76	\$1,906.76				\$0.00
5/11/2022	\$1,906.76	5/1/2022	\$1,906.76	\$1,906.76				\$0.00
6/8/2022	\$1,906.76	6/1/2022	\$1,906.76	\$1,906.76				\$0.00
7/11/2022	\$1,906.76	7/1/2022	\$1,906.76	\$1,906.76				\$0.00
8/11/2022	\$1,906.76	8/1/2022	\$1,906.76	\$1,906.76				\$0.00
9/12/2022	\$1,906.76	9/1/2022	\$1,906.76	\$1,906.76				\$0.00
10/11/2022	\$1,906.76	10/1/2022	\$1,906.76	\$1,906.76				\$0.00
11/14/2022	\$1,906.76	11/1/2022	\$1,906.76	\$1,906.76				\$0.00
12/12/2022	\$1,906.76	12/1/2022	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
1/11/2023	\$1,906.76	1/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
2/13/2023	\$1,906.76	2/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
3/13/2023	\$1,906.76	3/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
4/11/2023	\$1,906.76	4/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
5/11/2023	\$1,906.76	5/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
6/26/2023	\$1,906.76	6/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
7/11/2023	\$1,906.76	7/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
8/11/2023	\$1,906.76	8/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)

9/11/2023	\$1,906.76	9/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
10/11/2023	\$1,906.76	10/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
11/13/2023	\$1,906.76	11/1/2023	\$1,844.16	\$1,844.16			\$62.60	(\$0.00)
12/5/2023	\$2,058.64	12/1/2023	\$2,058.64	\$2,058.64				\$0.00
1/10/2024	\$2,058.64	1/1/2024	\$2,058.64	\$2,058.64				\$0.00
2/13/2024	\$2,058.64	2/1/2024	\$2,058.64	\$2,058.64				\$0.00
3/12/2024	\$2,058.64	3/1/2024	\$2,058.64	\$2,058.64				\$0.00
4/12/2024	\$2,058.64	4/1/2024	\$2,058.64	\$2,058.64				\$0.00
5/13/2024	\$2,058.64	5/1/2024	\$2,058.64	\$2,058.64				\$0.00
6/13/2024	\$2,058.64	6/1/2024	\$2,058.64	\$2,058.64				\$0.00
7/12/2024	\$2,058.64	7/1/2024	\$2,058.64	\$2,058.64				\$0.00
8/12/2024	\$2,058.64	8/1/2024	\$2,058.64	\$2,058.64				\$0.00
9/16/2024	\$2,058.64	9/1/2024	\$2,058.64	\$2,058.64				\$0.00
10/15/2024	\$2,058.64	10/1/2024	\$2,058.64	\$2,058.64				\$0.00
11/5/2024	\$2,175.56	11/1/2024	\$2,175.56	\$2,175.56				\$0.00
12/12/2024	\$2,175.56	12/1/2024	\$2,175.56	\$2,175.56				\$0.00
1/13/2024		1/1/2024	\$2,175.56 returned NSF 1/17/25					\$0.00
2/13/2024		1/1/2024	\$2,175.56 returned NSF 2/20/25					\$0.00
3/12/2025		1/1/2024	\$2,175.56 returned NSF 3/18/25					\$0.00
		1/1/2024	\$2,175.56					\$0.00
		2/1/2024	\$2,175.56					\$0.00
		3/1/2024	\$2,175.56					\$0.00
		4/1/2024	\$2,175.56					\$0.00
								\$0.00
								\$0.00

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 5:20-00795-MJC
Chong Yon Huber aka Sujin Huber	:	
aka Sujin Chong Huber	:	Chapter 13
Debtor	:	
=====	:	
TH MSR HOLDINGS, LLC	:	
c/o RoundPoint Mortgage Servicing LLC	:	
	:	
Movant	:	
vs.	:	
	:	
Chong Yon Huber aka Sujin Huber	:	
aka Sujin Chong Huber	:	
Debtor	:	
	:	
Jack N Zaharopoulos,	:	
	:	
Trustee/Respondent	:	

CERTIFICATION OF SERVICE

I, Michael Clark, an attorney duly admitted to practice law before the District Courts of the Commonwealth of Pennsylvania, respectfully certify that I am not a party to this action, am over 18 years of age.

On April 15, 2025, I electronically filed the Response to Notice of Final cure Payment with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following:

Alan Brian Jones, Esquire
Via ECF
Debtors' Attorney

Jack N Zaharopoulos
Via ECF
Trustee

On April 15, 2025 I served the following with the foregoing Response to Notice of Final cure Payment by regular first-class mail postage prepaid addressed as follows:

Chong Yon Huber
3 Wagon Lane
Jefferson Township, PA 18436-3950
Via First Class Mail
Debtor

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2025

/s/ Michael Clark
Michael Clark, Esquire